

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Samia Azar
Debtor

Samia Azar
Movant,

vs.

Time Investment Co, INC,
Respondent

CHAPTER 7

NO: 19-11479

MOTION TO AVOID LIEN PURSUANT TO 11 U.S.C. §522(F)(1)(B)

AND NOW, comes Debtor, Samia Azar, by and through her counsel, Charles Laputka, Esquire, and respectfully moves the Court to avoid the lien of Time Investment Co, INC on Debtor's exempt property pursuant to 11 U.S.C. Section 522(f)(1)(B) and avers as follows:

1. The Debtor, Samia Azar, filed a voluntary petition under Chapter 7 of the Bankruptcy Code on March 11, 2019
2. Respondent, Time Investment Co, INC, filed a lien against the Debtor's real estate in the amount of \$11,416.62 on January 15, 2019 by filing a UCC Financing Statement with the Recorder of Deeds of Lehigh County, under instrument number: 2016035076, attached hereto incorporated hereby and marked Exhibit "A" including her residence.
3. Debtor claims all property as exempt pursuant to the Amended Schedule C filed with the Court on March 11, 2019.
4. Debtor alleges that the fair market value of her real estate is listed and the property claimed is exempt as set forth in Schedule A of the Bankruptcy Petition.

5. The Debtor is entitled to exempt the full value of her ownership interest in the home as set forth on the Amended Schedule C.

6. Since Respondent's non-possession non-purchase money lien continues to impair the afore-mentioned exempt asset, Debtor, Samia Azar, is entitled to have said lien against her home avoided pursuant to 11 U.S.C. Section 522(f)(1)(B).

WHEREFORE, Debtor, Samia Azar, respectfully requests this Honorable Court enter an order avoiding the lien held by Time Investment Co., INC and granting such further relief as deemed just and appropriate.

Dated: June 26, 2019

/s/ *Charles Laputka, Esquire*

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